

Fill in this information to identify the case:

Debtor 1 Anthony E. Heindl

Debtor 2
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PACase number 20-01345 HWV**Form 4100R****Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: M&T Bank

Court claim no. (if known): 6-2

Last 4 digits of any number you use to identify the debtor's account: 7450

Property address:

7 Pinewood Circle
Hanover, PA 17331**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____**Part 3: Postpetition Mortgage Payment**

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:	(a)	\$ <u>3,258.15</u>
b. Total fees, charges, expenses, escrow, and costs outstanding:	+ (b)	\$ <u>0.00</u>
c. Total. Add lines a and b.	(c)	\$ <u>3,258.15</u>

Creditor asserts that the debtor(s) are contractually obligated for 08 / 01 / 2023
the postpetition payment(s) that first became due on:

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Michael Farrington

Date 10/11/2023

Michael Farrington
11 Oct 2023, 08:52:30, EDT

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

Loan Number: XXXXXXXXXX
Mortgagor Last Name: Heindl Jr
Property Address: 7 Pinewood Circle
Hanover PA 17331
Date Produced: 10/5/2023

Filing Date: 4/22/2020
Case Number: 20-01345
Investor: M&T Bank
Next Analysis:
Processor ID:

LPS COMPARISON

TRANSACTION DATE	AMOUNT RECEIVED	CONT. DATE APPLIED TO	CONT. PYMT AMOUNT	CONT. PYMT SHOULD BE	DIFFERENCE OF ESCROW	TO/FROM LPS SUSPENSE	LPS SUSPENSE BALANCE
					\$0.00	\$0.00	\$0.00
6/17/2020	\$459.00	suspense	\$0.00	\$0.00	\$0.00	\$459.00	\$459.00
6/29/2020	\$459.00	suspense	\$0.00	\$0.00	\$0.00	\$459.00	\$918.00
6/30/2020	\$0.00	8/1/2019	\$918.00	\$912.90	\$5.10	-\$918.00	\$0.00
7/14/2020	\$459.00	suspense	\$0.00	\$0.00	\$0.00	\$459.00	\$459.00
7/29/2020	\$459.00	suspense	\$0.00	\$0.00	\$0.00	\$459.00	\$918.00
7/30/2020	\$0.00	9/1/2019	\$918.00	\$912.90	\$5.10	-\$918.00	\$0.00
8/13/2020	\$459.00	suspense	\$0.00	\$0.00	\$0.00	\$459.00	\$459.00
8/26/2020	\$459.00	suspense	\$0.00	\$0.00	\$0.00	\$459.00	\$918.00
8/27/2020	\$0.00	10/1/2019	\$918.00	\$912.90	\$5.10	-\$918.00	\$0.00
4/20/2021	\$348.14	Trustee	\$0.00	\$0.00	\$0.00	\$348.14	\$348.14
4/21/2021	\$0.00	pre-pet FCL fees	\$348.14	\$348.14	\$0.00	-\$348.14	\$0.00
5/21/2021	\$369.42	Trustee	\$0.00	\$0.00	\$0.00	\$369.42	\$369.42
5/24/2021	\$0.00	pre-pet FCL fees	\$369.42	\$369.42	\$0.00	-\$369.42	\$0.00
6/22/2021	\$369.42	Trustee	\$0.00	\$0.00	\$0.00	\$369.42	\$369.42
6/23/2021	\$0.00	pre-pet FCL fees	\$369.42	\$369.42	\$0.00	-\$369.42	\$0.00
7/19/2021	\$369.42	Trustee	\$0.00	\$0.00	\$0.00	\$369.42	\$369.42
7/20/2021	\$0.00	pre-pet FCL fees	\$369.42	\$369.42	\$0.00	-\$369.42	\$0.00
8/19/2021	\$369.42	Trustee	\$0.00	\$0.00	\$0.00	\$369.42	\$369.42
8/20/2021	\$0.00	pre-pet FCL fees	\$0.70	\$0.70	\$0.00	-\$0.70	\$368.72
8/20/2021	\$0.00	pre-pet inspec	\$8.72	\$8.72	\$0.00	-\$8.72	\$360.00
9/17/2021	\$369.42	Trustee	\$0.00	\$0.00	\$0.00	\$369.42	\$729.42
9/20/2021	\$0.00	pre-pet inspec	\$11.50	\$11.50	\$0.00	-\$11.50	\$717.92
10/21/2021	\$369.42	Trustee	\$0.00	\$0.00	\$0.00	\$369.42	\$1,087.34
10/22/2021	\$0.00	pre-pet inspec	\$13.28	\$13.28	\$0.00	-\$13.28	\$1,074.06
11/3/2021	\$0.00	pre-pet inspec	\$26.50	\$26.50	\$0.00	-\$26.50	\$1,047.56
11/3/2021	\$0.00	pre-pet LC	\$183.60	\$183.60	\$0.00	-\$183.60	\$863.96
11/22/2021	\$358.81	Trustee	\$0.00	\$0.00	\$0.00	\$358.81	\$1,222.77
11/23/2021		11/1/2019	\$918.12	\$918.12	\$0.00	-\$918.12	\$304.65
12/21/2021	\$358.81	Trustee	\$0.00	\$0.00	\$0.00	\$358.81	\$663.46

TRANSACTION DATE	AMOUNT RECEIVED	CONT. DATE APPLIED TO	CONT. PYMT AMOUNT	CONT. PYMT SHOULD BE	DIFFERENCE OF ESCROW	TO/FROM LPS SUSPENSE	LPS SUSPENSE BALANCE
1/26/2022	\$358.81	Trustee	\$0.00	\$0.00	\$0.00	\$358.81	\$1,022.27
2/28/2022	\$358.81	Trustee	\$0.00	\$0.00	\$0.00	\$358.81	\$1,381.08
3/21/2022	\$358.81	Trustee	\$0.00	\$0.00	\$0.00	\$358.81	\$1,739.89
4/18/2022	\$358.81	Trustee	\$0.00	\$0.00	\$0.00	\$358.81	\$2,098.70
6/17/2022	\$0.00	escrow	\$262.46	\$262.46	\$0.00	-\$262.46	\$1,836.24
6/17/2022	\$358.81	Trustee	\$0.00	\$0.00	\$0.00	\$358.81	\$2,195.05
6/17/2022	\$0.00	12/1/2019	\$918.12	\$918.12	\$0.00	-\$918.12	\$1,276.93
6/17/2022	\$0.00	1/1/2020	\$918.12	\$918.12	\$0.00	-\$918.12	\$358.81
6/22/2022	\$918.12	rev (12/1/19)	\$0.00	\$0.00	\$0.00	\$918.12	\$1,276.93
6/22/2022	\$918.12	rev (1/1/20)	\$0.00	\$0.00	\$0.00	\$918.12	\$2,195.05
6/24/2022	\$0.00	12/1/2019	\$918.12	\$918.12	\$0.00	-\$918.12	\$1,276.93
6/24/2022	\$0.00	1/1/2020	\$918.12	\$918.12	\$0.00	-\$918.12	\$358.81
7/20/2022	\$358.81	Trustee	\$0.00	\$0.00	\$0.00	\$358.81	\$717.62
8/22/2022	\$385.53	Trustee	\$0.00	\$0.00	\$0.00	\$385.53	\$1,103.15
8/23/2022	\$1,003.19	suspense	\$0.00	\$0.00	\$0.00	\$1,003.19	\$2,106.34
9/16/2022	\$386.50	Trustee	\$0.00	\$0.00	\$0.00	\$386.50	\$2,492.84
10/11/2022		Loan mod started					
10/11/2022	\$1,819.71	escrow	\$1,819.71	\$1,819.71	\$0.00	\$0.00	\$2,492.84
10/13/2022	-\$358.81	escrow	\$0.00	\$0.00	\$0.00	-\$358.81	\$2,134.03
10/13/2022	\$358.81	escrow	\$358.81	\$358.81	\$0.00	\$0.00	\$2,134.03
10/19/2022	\$0.00	8/1/2022	\$1,026.62	\$1,026.62	\$0.00	-\$1,026.62	\$1,107.41
10/24/2022	\$0.00	pre-pet fees	\$722.03	\$722.03	\$0.00	-\$722.03	\$385.38
10/24/2022	\$1,026.62	suspense	\$0.00	\$0.00	\$0.00	\$1,026.62	\$1,412.00
11/3/2022	\$0.00	9/1/2022	\$1,026.62	\$1,026.62	\$0.00	-\$1,026.62	\$385.38
11/28/2022	\$1,026.62	suspense	\$0.00	\$0.00	\$0.00	\$1,026.62	\$1,412.00
11/29/2022	\$0.00	10/1/2022	\$1,026.62	\$1,026.62	\$0.00	-\$1,026.62	\$385.38
1/17/2023	\$1,026.62	suspense	\$0.00	\$0.00	\$0.00	\$1,026.62	\$1,412.00
1/18/2023	\$0.00	11/1/2022	\$1,026.62	\$1,026.62	\$0.00	-\$1,026.62	\$385.38
6/16/2023	\$1,086.05	suspense	\$0.00	\$0.00	\$0.00	\$1,086.05	\$1,471.43
8/1/2023	\$2,196.16	escrow	\$1,941.96	\$1,941.96	\$0.00	\$254.20	\$1,725.63
8/3/2023	\$0.00	pre-pet fees	\$639.58	\$639.58	\$0.00	-\$639.58	\$1,086.05
8/3/2023	\$385.38	escrow	\$385.38	\$385.38	\$0.00	\$0.00	\$1,086.05
8/18/2023	\$0.00	6/1/2023	\$1,086.05	\$1,086.05	\$0.00	-\$1,086.05	\$0.00
8/21/2023		Loan mod completed			\$0.00	\$0.00	\$0.00
9/22/2023	\$1,086.05	7/1/2023	\$1,086.05	\$1,086.05	\$0.00	\$0.00	\$0.00
not rcvd		8/1/2023	\$1,086.05	\$1,086.05	\$0.00	-\$1,086.05	-\$1,086.05
not rcvd		9/1/2023	\$1,086.05	\$1,086.05	\$0.00	-\$1,086.05	-\$2,172.10
not rcvd		10/1/2023	\$1,086.05	\$1,086.05	\$0.00	-\$1,086.05	-\$3,258.15

[illegible]

\$15.30

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Anthony E. Heindl Jr. aka
Anthony E Heindl**

Debtor(s)

M&T Bank

Movant

vs.

**Anthony E. Heindl Jr. aka Anthony E
Heindl**

Debtor(s)

Jack N. Zaharopoulos,

Trustee

BK NO. 20-01345 HWV

Chapter 13

Related to Claim No. 6-2

CERTIFICATE OF SERVICE

RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT

I, Michael P. Farrington of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on October 11, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Anthony E. Heindl Jr. aka Anthony E Heindl
7 Pinewood Circle
Hanover, PA 17331

AttorneyS for Debtor(s) (via ECF)

Stephen Wade Parker
Etzweiler and Withers LLC
105 N. Front Street, SUITE 100
Harrisburg, PA 17101

Nicholas G. Platt
Mooney Law
230 York Street
Hanover, PA 17331

Trustee (via ECF)

Jack N. Zaharopoulos
8125 Adams Drive
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail.

Dated: October 11, 2023

/s/ Michael P. Farrington

Michael P. Farrington, Esquire
Attorney I.D. 329636
KML Law Group, P.C.
BNY Mellon Independence Center
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215-627-1322
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